



Rapid Abstract Agency, LLC for the period September 15, 2010 to September 15, 2011 (the “Scottsdale Policy”).

3. Attached hereto as **Exhibit B** is a true copy of the complaint filed by Chase on or about September 16, 2010 in the Superior Court of New Jersey, Monmouth County, Law Division in the civil action captioned JPMorgan Chase Bank, N.A. v. Hawthorne Capital Corp., et al., docket no. MON-L-4617-10 (the “Underlying Action”).

4. Attached hereto as **Exhibit C** are true copies of the affidavits of service for Rapid and for Lisa Palermo in the Underlying Action dated September 22, 2010, as marked at the April 19, 2018 deposition of Lisa Ballestrieri as Exhibit “DL-24”.

5. Attached hereto as **Exhibit D** is a true copy of the email colloquy dated January 20, 2011 between Lisa Palermo and Chase Heitmann, as marked at the April 19, 2018 deposition of Lisa Ballestrieri as Exhibit “DL-31”.

6. Attached hereto as **Exhibit E** is a true copy of Endorsement No. 11 to the Scottsdale Policy.

7. Attached hereto as **Exhibit F** is a true copy of the General Liability Notice of Occurrence/Claim dated May 4, 2011, as marked at the April 19, 2018 deposition of Lisa Ballestrieri as Exhibit “DL-26”.

8. Attached hereto as **Exhibit G** is a true copy of the letter dated May 26, 2011 from Cheryl J. Lanier, Esq. to Lisa Palermo.

9. Attached hereto as **Exhibit H** is a true copy of the letter dated August 22, 2011 from Brian M. Duncan, Esq. to Cheryl J. Lanier, Esq., as marked at the April 19, 2018 deposition of Lisa Ballestrieri as Exhibit “DL-30”.

10. Attached hereto as **Exhibit I** is a true copy of the second amended complaint filed by Chase on or about November 19, 2012 in the Underlying Action.

11. Attached hereto as **Exhibit J** is a true copy of the Confidential Settlement Agreement and Release dated December 14, 2015 between Chase and Rapid for the Underlying Action (the “Settlement Agreement”).<sup>1</sup>

12. Attached hereto as **Exhibit K** is a true copy of the Final Consent Judgment filed by the Honorable Jamie S. Perri, J.S.C. on or about January 5, 2016 in the Underlying Action.

13. Attached hereto as **Exhibit L** is a true copy of the transcript of the April 19, 2018 deposition of Lisa Ballestrieri in this action.

14. Attached hereto as **Exhibit M** is a true copy of the email colloquy dated February 1, 2011 to February 4, 2011 between Chase Heitmann, MaryAnne Ryerson, and Laurie Conklin.

15. Attached hereto as **Exhibit N** is a true copy of portions of the answer to Chase’s complaint filed by Rapid and Lisa Palermo on or about November 8, 2010 in the Underlying Action, produced during discovery in this case.

16. Attached hereto as **Exhibit O** is a true copy of Rapid’s Renewal Application for Business and Management (BAM) Indemnity Insurance dated September 10, 2010, as marked at the April 19, 2018 deposition of Lisa Ballestrieri as Exhibit “DL-22”.

17. Attached hereto as **Exhibit P** is a true copy of Chase’s answers to the interrogatories of Rapid and Lisa Palermo in the Underlying Action dated May 3, 2011, as marked at the April 19, 2018 deposition of Lisa Ballestrieri as Exhibit “DL-7”.

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<sup>1</sup> Chase has designated the Settlement Agreement as “Confidential”, pursuant to the Court’s discovery confidentiality order in this action filed on August 8, 2017. See Docket Entry No. 7. Accordingly, the Settlement Agreement attached as Exhibit J to this declaration will not be filed on the Court’s ECF system. However, a complete set of all exhibits to this declaration, including Exhibit J, will be included with the courtesy copies of Scottsdale’s moving papers sent to the Court and to counsel for Chase.

18. Attached hereto as **Exhibit Q** are true copies of the March 21, 2011 responses of Rapid and Lisa Palermo to Chase's notice to produce and interrogatories in the Underlying Action.

19. Attached hereto as **Exhibit R** is a true copy of the third-party complaint filed by Rapid and Lisa Palermo on or about April 5, 2012 in the Underlying Action.

/s/ *Christian A. Cavallo*  
Christian A. Cavallo, Esq.

Dated: July 13, 2018